

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
Case No.: 1:25-cv-20757-JB/Torres**

JANE DOE,  
Plaintiff,

v.

STEVEN K. BONNELL II,  
Defendant.

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**DEFENDANT STEVEN K. BONNELL II'S MOTION FOR LEAVE TO FILE  
ADDITIONAL DOCUMENTS UNDER SEAL**

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Defendant Steven K. Bonnell II (“Bonnell”), pursuant to Southern District of Florida Local Rule 5.4 and Paragraph 12 of the Protective Order Governing Discovery [D.E. 116], respectfully requests leave of Court to file additional unredacted versions of documents related to the pending Sanction Motions (defined herein) under seal, and states as follows in support:

1. As detailed in Bonnell’s Motion for Leave to File Certain Documents Under Seal [D.E. 189], Bonnell filed a Motion for Sanctions Pursuant to Fed. R. Civ. P. 11 [D.E. 183] (“Bonnell’s Sanctions Motion”) that relies on deposition testimony of a non-party who was portrayed on certain online platforms as “Rose” (hereafter, “Non-Party”).

2. Plaintiff Jane Doe (“Plaintiff”) has designated Non-Party’s entire deposition transcript as “Confidential” pursuant to the Protective Order Governing Discovery. While Bonnell agrees that Non-Party’s identifying information (i.e., legal name) is properly designated as “Confidential”, Bonnell disputes Plaintiff’s blanket designation of Non-Party’s entire deposition transcript as “Confidential”.

3. Plaintiff has yet to move the Court for a ruling as to whether Non-Party’s entire deposition transcript may be properly treated as “Confidential”. To comply with the current-but-disputed “Confidential” designation of Non-Party’s entire deposition transcript, Bonnell has and will file redacted versions of any papers citing Non-Party’s deposition testimony that conceal Non-Party’s testimony (as well as Non-Party’s legal name).

4. Specifically, on December 11, 2025, Bonnell filed a redacted version of his Reply to Plaintiff’s Opposition to Motion for Sanctions Pursuant to Fed. R. Civ. P. 11 [D.E. 192] (“Bonnell’s Reply”).

5. On or before December 18, 2025, Bonnell will file his Response in Opposition to Plaintiff’s Motion for Sanctions Pursuant to Fed. R. Civ. P. 11 [D.E. 186] (“Plaintiff’s Sanctions

Motion”).<sup>1</sup>

6. Bonnell also anticipates citing Non-Party’s deposition testimony in other future briefings.

7. Non-Party’s deposition testimony is central to Bonnell’s Reply and forthcoming Response in Opposition to Plaintiff’s Motion for Sanctions (“Bonnell’s Response”). Bonnell therefore respectfully requests leave of Court to file unredacted versions of his Reply and forthcoming Response so that the Court can fully consider the Sanction Motions.

8. Bonnell proposes that the unredacted versions of his Reply and forthcoming Response remain under seal until the Court has ruled on Plaintiff’s forthcoming motion as to whether Non-Party’s entire deposition transcript is properly treated as “Confidential”. If the Court finds that Non-Party’s entire deposition transcript is not properly treated as “Confidential”, the Court should authorize Bonnell to file versions of his Reply and forthcoming Response that redact only Non-Party’s legal name and not Non-Party’s deposition testimony.

**WHEREFORE**, Defendant Steven K. Bonnell II respectfully requests the Court grant him leave to file under seal unredacted versions of his Reply to Plaintiff’s Opposition to Motion for Sanctions Pursuant to Fed. R. Civ. P. 11 [D.E. 192] and his forthcoming Response in Opposition to Plaintiff’s Motion for Sanctions Pursuant to Fed. R. Civ. P. 11, and award any further relief the Court deems just and proper.

**LOCAL RULE 7.1(a)(2) CERTIFICATE OF CONFERRAL**

WE HEREBY CERTIFY that on December 2, 2025, undersigned counsel for movant conferred with counsel for Plaintiff regarding the relief sought in this Motion, and Plaintiff’s counsel indicated they took no position on the relief requested.

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<sup>1</sup> Bonnell’s Sanctions Motion and Plaintiff’s Sanctions Motion are referred to collectively as “Sanction Motions”.

Dated: December 12, 2025

Respectfully submitted,

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*Counsel for Steven K. Bonnell II*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 12, 2025, a true and correct copy of the foregoing document was electronically filed with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record, including those listed in the below Service List, via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Patricia M. Patino

Attorney

**SERVICE LIST**

*Jane Doe v. Steven K. Bonnell II*  
*Case No.: 1:25-cv-20757-JB*

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